

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
AT CHATTANOOGA**

TERPSEHORE MARAS,

Plaintiff,

v.

CHATTANOOGA NEWS  
CHRONICLE, *et al.*,

Defendants.

Case No: 1:21-cv-317

**MEDIA MATTERS FOR AMERICA MOTION TO DISMISS**

Pursuant to Rules 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure, Defendant Media Matters for America, through counsel, respectfully moves to dismiss Plaintiff Terpsehore Maras's Amended Complaint (ECF No. 1-2). For the reasons set forth in the accompanying Memorandum of Points and Authorities, the Amended Complaint should be dismissed.

Filed: March 7, 2022

Respectfully submitted,

**NEAL & HARWELL, PLC**

/s/ Mozianio S. Reliford, III

Mozianio S. Reliford, III (BPR # 36170)

William J. Harbison II (BPR # 33330)

1201 Demonbreun Street, Suite 1000

Nashville, TN 37213

(615) 244-1713

treliford@nealharwell.com

jharbison@nealharwell.com

**ELIAS LAW GROUP LLP**

William B. Stafford (admitted *pro hac vice*)

1700 Seventh Ave., Suite 2100

Seattle, WA 98101

(206) 656-0176  
BStafford@elias.law

Melinda K. Johnson (admitted *pro hac vice*)  
10 G St. NE, Suite 600  
Washington, DC 20002  
(202) 968-4490  
MJohnson@elias.law

*Counsel for Defendant Media Matters for America*

### **CERTIFICATE OF CONSULTATION**

Pursuant to the Court's Order Governing Motions to Dismiss, ECF No. 7, counsel for Defendant Media Matters for America contacted Plaintiff's counsel on February 16, February 24, March 2, March 3, and March 7 to request to confer. The parties were unable to reach an agreement that the pleading is curable by a permissible amendment.

/s/ William B. Stafford  
William B. Stafford

**CERTIFICATE OF SERVICE**

I hereby certify that on March 7, 2022, a true and correct copy of the foregoing was filed through the Court's CM/ECF system, which will cause service of the same upon counsel of record in this matter and via mail to the following non-registered users:

Ali Abdul Razaq a/k/a Ali Alexander  
5125 Pinellas Avenue  
Keller, TX 76244

/s/ Moziano S. Reliford, III  
Moziano S. Reliford, III